



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MB/AS  
F. #2019R01465

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 23, 2021

By ECF and Overnight Mail

Alex Spiro, Esq.  
Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Ave., 22<sup>nd</sup> Floor  
New York, NY 10010

Re: United States v. Javier Aguilar  
Criminal Docket No. 1:20-CR-00390 (ENV)

Dear Mr. Spiro:

Enclosed please find the government's tenth production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's earlier productions. The government again requests reciprocal discovery from the defendant.

Specifically, enclosed please find: (1) the contents of the defendant's Apple iCloud account associated with an Apple ID that is a gmail account used by the defendant, BATES JA-Apple-0000000001 - JA-Apple-0000007981;<sup>1</sup> and (2) an updated index including these materials. Because the iCloud account being produced belongs to the defendant, in an

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<sup>1</sup> The data is being produced from the filter team because the iCloud account is currently being reviewed for potentially privileged material and the prosecution team does not have access to the documents.

abundance of caution, the government is producing a copy of the entire collection of data it received from Apple, regardless of whether the information has been seized pursuant to the relevant search warrant.

Very truly yours,

MARK J. LESKO  
Acting United States Attorney

By: /s/ Mark E. Bini  
Mark E. Bini  
Andrey Spektor  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of the Court (ENV) (by ECF) (without enclosures)  
Ann Brickley & Adam Schwartz, U.S. Department of Justice (without enclosures)  
Derek Ettinger, Jonathan Robell & Clayton Solomon, U.S. Department of Justice  
(without enclosures)